

Disposition of Scoping Comments

Scoping Process

The Hancock Forest Road Access Project (Project) first appeared on the Klamath National Forest Schedule of Proposed Actions (SOPA) in April 2014. The Project has remained on the SOPA continuously since that time. Two parties, Klamath Siskiyou Wildlands Center (KS Wild) and the Environmental Protection Information Center (EPIC) expressed interest and requested notification of future actions on this Project.

Legal notice for the scoping period of the Project appeared in the newspaper of record, the Siskiyou Daily News on October 18, 2016. Scoping letters and a description of the proposal were mailed to the following parties. A sample letter and project description are attached.

- Klamath Siskiyou Wildlands Center
- Environmental Protection Information Center
- Shasta Indian Nation
- Quartz Valley Indian Reservation
- Shasta Nation, Inc.
- Confederated Tribes of the Siletz
- Siskiyou County Board of Supervisors, Ray Haupt
- Quail Unlimited
- Jefferson State Wildlife Consulting
- Northern California Resource Council
- Roseburg Forest Products
- Trinity River Lumber
- Timber Products
- Environmental Protection Agency
- Fruit Growers
- U.S. Fish and Wildlife Service
- NOAA Fisheries
- Oregon Department of Environmental Quality
- Oregon Department of Fish and Wildlife, Central Point Rogue Watershed District

As of December 1, 2016, comment letters had been received from KS Wild and the Environmental Protection Information Center. These letters are available on the project website.

The intent of scoping is to identify information from the public that is relevant to the proposed action and the potential decision to be made by federal officials. Scoping information is used to:

- refine the proposed action
- explore possible alternatives
- identify potential environmental effects
- determine the depth or detail of analysis, and document type
- adjust interdisciplinary team membership
- refine public involvement strategy

The Forest Service considers scoping information to be relevant if it identifies:

- an issue, which is a cause-effect relationship between a proposed action and its effects
- ways to measure effects
- the potential significance of effects
- ways to avoid or reduce an effect through an alternative, including mitigation

Scoping information is not relevant for alternative development if it is:

- beyond the scope of the proposed action
- unrelated to the decision being made
- already decided by law, regulation or policy
- conjectural or not supported by scientific evidence
- general comment or position statement

Disposition of Scoping Comments

Comment #	Comment Text	Alternative Proposed	Relevant Issue	Response
EPIC #1	“The purpose and need for the project is in direct conflict with the spirit and intent of the National Environmental Policy Act. The analysis should not justify a decision already made. “The need to approve access” as stated in the scoping notice would be less biased if stated, “there is a need for the landowner to access the private parcel” or “there is a need to analyze reasonable access.”	No	No	The Purpose and Need was reworded to address this concern.
EPIC #2	The Klamath National Forest is not obligated to approve construction of the proposed road, however, it is obligated to provide reasonable access.	No	No	It is correct that the Klamath National Forest is obliged to allow reasonable access if no other reasonable alternative exists.
EPIC #3	The use of helicopter to reach the private parcel is reasonable access. It appears from the map provided that there is already access from the northwest portion of this section.”	Yes	Yes	This alternative was considered. See Alternatives Considered but Eliminated from Detailed Study in the body of the EA.
EPIC #4	The existing and desired future condition both speak to access on the eastern half of this section. From the map it appears that access to the eastern half could come from the western portion of this section, therefore reasonable access is already available. Further, the only area that may be accessible from the east is a very small portion of the section given the steepness of terrain and the location of Cottonwood Creek.	Yes	Yes	This alternative was considered. See Alternatives Considered but Eliminated from Detailed Study in the body of the EA.

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EPIC #5	The Klamath National Forest must identify the minimum road system needed of which it can afford to maintain. Adding another road to the system would be contrary to the direction from the Regional Office to work towards ecological restoration.	No	No	The road on National Forest System lands, if authorized would not be a national forest transportation system road. The Travel Management Rule specifically provided for other roads that are not a part of the national forest transportation system. Roads that only access private lands and are not needed for management of National Forest System lands are not part of the National Forest Transportation System (Motorized Travel Management FEIS, pg. 17 and 18). Other roads and trails on the Klamath National Forest are not currently part of the national forest transportation system; they are either managed by another agency or private entity (Motorized Travel Management FEIS, pg. 85). See also 36 CFR 261.13(h), 261.14(e). No maintenance obligation would be incurred by the Forest Service for the proposed road.
EPIC #6	We are concerned with habitat fragmentation and the effects that the road construction and reconstruction will have on all plant and animal species. This includes Threatened, Endangered, Sensitive, Management Indicator Species, Survey and Manage, Migratory Birds and others. Please disclose if the proposed road is within Critical Habitat or near Activity Centers for Northern spotted owl. Please also analyze and disclose the effects of the proposed road on animal and botanical species and their habitat.	No	No	These issues are addressed in the Wildlife section of the EA. See also Biological Assessments on the Project website and the Wildlife and Botany reports where these concerns are addressed.
EPIC #7a	Please analyze and disclose the cumulative watershed impacts of private logging, yarding, and road construction in conjunction with proposed road work and tree removal on public lands.	No	Yes	Although the Forest Service has no control over logging on private lands, these are considered as connected actions, and are considered in cumulative effects. Logging on private lands is regulated by the State of Oregon.

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EPIC #7b	Please analyze the increased fire hazard and fire risk to adjacent public lands, the cumulative recreational and scenic impacts of high elevation road construction, tree removal and logging and the effects to water quality.	No	No	These concerns are addressed in Fire and Fuels section of the EA.
EPIC #8	In summary, please note that on the north side of the Siskiyou Crest the Rogue River - Siskiyou National Forest has developed and considered helicopter access as a proposed action that provides reasonable access to private industrial timberlands within the federal checkerboard land ownership network. Such an alternative should be developed and considered here. Please also consider that this section of land is currently roaded, so reasonable access already exists.	Yes	Yes	<p>The question of whether reasonable access already exists is a relevant issue. An alternative was developed to address both helicopter yarding and use of the existing road system on AP Timber lands. See Alternatives Considered, but not Fully Developed in the body of the EA.</p> <p>Whether helicopters were considered as reasonable access on the Siskiyou National Forest has no bearing on the site-specific circumstances of this project.</p>
KS Wild #1	<p>Please note that the scoping notice does not reveal the following details that we hope will be considered in the forthcoming NEPA analysis:</p> <ul style="list-style-type: none"> -Is the proposed road work and tree removal on National Forest lands located in the matrix or the LSR land use allocation? -Is the proposed road work and tree removal within an active Northern spotted owl home range? -Is the proposed road work and tree removal within Northern spotted owl critical habitat? -Are Pacific fisher present in the planning area? 	No	No	<p>The project area is in matrix lands. See the description of the Proposed Action in the body of the EA and the Forest Plan consistency checklist on the project website.</p> <p>The Wildlife Report on the project website and the wildlife section of the EA address questions related to effects on wildlife.</p>

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KS Wild #2	It appears that there is already existing road access to the private lands from the northeast corner of the section, why is road construction across public lands necessary in order to provide additional roaded access to a private parcel that already has roaded access?	Yes	Yes	The question of reasonable access is central to the project. The no action alternative is responsive to this concern, as are alternatives considered but eliminated from detailed study.
KS Wild #3	What will the cumulative impacts of private logging, yarding, and road construction consist of in conjunction with proposed road work and tree removal on public lands?	No	Yes	Cumulative impacts of actions on private lands are addressed as a connected action in cumulative effects sections of the EA.
KS Wild #4	Will the logging of private lands increase fire hazard and fire risk to adjacent public lands? What will the cumulative recreational and scenic impacts of high elevation road construction, tree removal and logging consist of?	No	No	These concerns are addressed in Fire and Fuels section of the EA.
KS Wild #5	Please note that on the north side of the Siskiyou Crest the Rogue River Siskiyou National Forest has developed and considered helicopter access as a proposed action that provides reasonable access to private industrial timberlands within the federal checkerboard land ownership network. Such an alternative should be developed and considered here	Yes	Yes	<p>The question of whether reasonable access already exists is a relevant issue. An alternative was developed to address both helicopter yarding and use of the existing road system on AP Timber lands. See Alternatives Considered but Eliminated from Detailed Study.</p> <p>Whether helicopters were considered as reasonable access on the Siskiyou NF has no bearing on the site-specific circumstances of this project.</p>